

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BLACKSTONE INTERNATIONAL, LTD.,
a Maryland corporation,

Plaintiff,

v.

E2 LIMITED, a Hong Kong company;
COLLIN CARPENTER, individually and
on behalf of his marital community; BIG
BOX SALES & MARKETING, INC.; a
Washington corporation; TECHNOMATE
MANUFACTORY, LTD.,

Defendants.

CASE NO. 2:20-CV-001686-RSM

**STIPULATED MOTION AND
ORDER REGARDING ORDER TO
TEMPORARILY FILE UNDER
SEAL**

**NOTE ON MOTION CALENDAR:
Thursday, April 1, 2021**

STIPULATION

1. On March 26, 2021, Plaintiff Blackstone International, Ltd., on the one hand (“Blackstone”), and Defendants E2 Limited, Collin Carpenter, and Technomate Manufactory, Ltd., on the other hand (collectively, “Defendants”), filed a Stipulated Motion to Temporarily File Under Seal [Dkt. #46] (the “Temporarily Seal Motion”).

2. The Court granted the parties’ Temporarily Seal Motion on March 29, 2021. *See* Order to Temporarily File Under Seal [Dkt. #55] (the “Temporarily Seal Order”).

3. Pursuant to Section 9(b) of the Temporarily Seal Order, “[o]n or before April 2, 2021” is the current deadline for defendant Collin Carpenter (“Carpenter”) and non-party Costco Wholesale Corporation (“Costco”) to: “(a) identify which documents Carpenter and/or Costco believe need to

1 maintained under seal and/or redacted; (b) identify the portions of Blackstone's opposition brief that
2 Carpenter and/or Costco believe needs to be redacted (if any); and (c) file their own motion to seal (in whole
3 or redacted portions) pursuant to the requirements of LCR 5(g) and, particularly LCR 5(g)(3)(B)."

4 4. Counsel for Carpenter and Costco has requested as a matter of professional courtesy an
5 extension of the deadline to file their own motion to seal and complete the other related matters of Section
6 9(b) of the Temporarily Seal Order.

7 5. The parties' counsel have met and conferred in good faith regarding the requested extension,
8 and Plaintiff has agreed to the requested extension.

9 6. Accordingly, pursuant to the parties' stipulation, and subject to the Court's approval, the
10 parties specifically agree as follows:

11 a. On or before April 9, 2021, Carpenter and Costco will (a) identify which documents
12 Carpenter and/or Costco believe need to maintained under seal and/or redacted; (b) identify
13 the portions of Blackstone's opposition brief that Carpenter and/or Costco believe needs to
14 be redacted (if any); and (c) file their own motion to seal (in whole or redacted portions)
15 pursuant to the requirements of LCR 5(g) and, particularly LCR 5(g)(3)(B).

16 b. The party or parties requesting that the materials remain under seal (*i.e.*, Carpenter and/or
17 Costco), will bear the burden to establish good cause for such motion, including the content
18 specified in LCR 5(g)(3)(B). Blackstone further reserves the right to oppose any such
19 motion to maintain the materials under seal.
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2 **SO STIPULATED** this April 1, 2021.

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4 By: /s/ Christopher M. Huck
5 Christopher M. Huck
(WSBA No. 34104)

6 /s/ Kit W. Roth
7 Kit W. Roth
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8 /s/ R. Omar Riojas
9 R. Omar Riojas
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By: /s/ Andrew J. Kubik
Andrew J. Kubik
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Attorneys for Defendants
E2 Limited, Collin Carpenter, and
Technomate Manufactory, Ltd.; and
Non-Party Costco Wholesale Corporation

ORDER

Pursuant to the above Stipulated Motion, **IT IS SO ORDERED.**

DATED this 5th day of April, 2021.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE